

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALEJANDRO GUTIERREZ and)	
ESTELA CARRASCO)	
)	
Plaintiff,)	Case No. 08 C 881
)	
v.)	Judge Holderman
)	
UNKNOWN AND UNNAMED DES PLAINES)	Magistrate Judge Mason
POLICE OFFICERS, UNKNOWN AND)	
UNNAMED JUNO LIGHTING GROUP, INC)	
EMPLOYEES, individually, JUNO LIGHTING)	
GROUP, INC and THE CITY OF DES PLAINES)	
)	
Defendants,)	JURY DEMAND

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiffs, ALEJANDRO GUTIERREZ and ESTELA CARRASCO, by and through their attorneys, Ed Fox & Associates, and pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, hereby moves this court to enter an order granting leave to file an amended complaint. In support of their motion, Plaintiffs state:

- 1) This action was commenced by the filing of a complaint on February 11, 2007, alleging causes of action under the Civil Rights Act of 1871 (42 U.S.C. § 1983) and state supplemental claims.
- 2) At the time of the filing of the original complaint, Plaintiffs did not know the identities of the individual defendants.
- 3) Plaintiffs are now informed and believe to be true that the individual defendants are Matthew Hicks, Thomas Stancato, Ronald Robinson, Michael Holdman, Richard Niznik, and Benjamin Ruzicka.

- 4) Plaintiffs request leave to amend their complaint to name the individual defendants.

Plaintiff's proposed amended complaint is attached hereto as Exhibit A.

- 5) Rule 15(a) of the Federal Rules of Civil Procedure states that leave to amend a complaint shall be freely given when justice so requires.

WHEREFORE, Plaintiffs request that the Court grant them leave to file the amended complaint attached hereto as Exhibit A.

BY: /s/ Leslie C. McCoy
Leslie C. McCoy

ED FOX & ASSOCIATES
Attorney for Plaintiff
300 W. Adams Street, Suite 330
Chicago, IL 60606
(312) 345 - 8877